
**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI**

DANIEL SOLENBERGER,

Plaintiff,

v.

HILLCREST DAVIDSON & ASSOCIATES, *et al.*

Defendant.

Case No. 4:17-CV-00702-GAF

NOTICE OF DEPOSITION DUCES TECUM OF THOMAS A. TARTER

Defendant Hillcrest, Davidson, and Associates LLC ("Hillcrest") hereby gives notice that it will take the deposition of Thomas A. Tarter on Thursday, May 3, 2018 at Smith Correll LLP, 11601 Wilshire Boulevard, Suite 2080, Los Angeles, California 90025, commencing at 9:30 a.m. and continuing until complete. The deposition will be recorded by stenographic means. Mr. Tarter is requested to produce for inspection and copying on or before Thursday, May 3, 2018, the documents listed in the attached Exhibit A.

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*Attorneys for Defendant Hillcrest,
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CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of April, 2018, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF System which will send a notice of electronic filing to all attorneys linked to this case.

s/ Catherine C. Theisen
Catherine C. Theisen

EXHIBIT A
DEFINITIONS

1. For purposes of this notice and request, the term "document" shall mean and include all documents and tangible things to the broadest extent included and described in the Federal Rules of Civil Procedure. The term "document" shall also include all non-identical copies (whether different from the originals because of any alterations, notes, comments, or other material contained therein or attached thereto or otherwise), and any attachments or enclosures.
2. As used herein, "you" refers to Thomas A. Tarter and his agents, representatives, employees, and any other person acting on his behalf or under his direction.

DOCUMENTS TO BE PRODUCED

1. Any transcript or other documentation of any testimony that you have given, either by deposition or in trial, in the last three years.
2. Any and all notes that you prepared in connection with your engagement with respect to this lawsuit.
3. All documents and underlying data that you reviewed, considered, and/or relied upon in forming the opinions that you may offer in connection with this case.
4. All documents and underlying data that were furnished to you or made available for your review by plaintiff, his agents, or his attorneys in connection with your engagement concerning this lawsuit.
5. All Documents reflecting or constituting communications between you and any person other than plaintiff's attorneys or their agents and which concern your engagement in this lawsuit, the opinions that you may offer in connection with this case, or information that constitutes a basis for any such opinion.

6. Any and all documents reflecting or constituting communications between you and plaintiff, any agent for plaintiff, and/or any attorney for plaintiff that:
- (a) relate to compensation for your study or testimony;
 - (b) identify facts or data that the plaintiff or his attorney provided and that you considered in forming the opinions to be expresses; or
 - (c) identify assumptions that the plaintiff's attorney provided and that you relied on in forming the opinions you may offer in this matter.
7. All invoices and billing and time records that reflect the amount of time worked by you and/or any of your colleagues with respect to your engagement in connection with this lawsuit.
8. Any and all documents you have prepared for this case and intend to use at trial.
9. Any other non-privileged documents you have in your possession concerning this lawsuit.